

Commission Secretary
Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, SW., Suite TW-A325
Washington, DC 20554

Re: Captive Communications LLC/Docket No. 06-36

Dear Ms. Dortch:

Attached please find Captive Communications LLC's Customer Proprietary Network Information (CPNI) Certification (EB Docket No. 06-36). If you any questions or need to contact, please feel free to do so anytime. Thank you.

Sincerely,



Anthony Diaz
CEO

Cc: FCC, Best Copy and Printing, Inc.

AD 02/24/2011

Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2011 covering prior calendar year of 2010

Date filed: February 22, 2011

Name of company covered by this certification: Captive Communications, LLC dba OneCloud Networks

Form 498 ID/SPIN: 143034782

Name of signatory: Anthony Diaz

Title of signatory: CEO

I, Anthony Diaz, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken actions (*i.e.*, proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

The company has not received customer complaints in the past year concerning the unauthorized release of CPNI.

The company represents and warrants that the above certification is consistent with 47 C.F.R. § 1.17 which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Signed _____

Attachments: Accompanying Statement explaining CPNI procedures
Explanation of actions taken against data brokers (if applicable)
Summary of customer complaints (if applicable)

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1. CPNI Use

- We use, disclose or permit access to CPNI to provide or market service offerings within the categories of service - local, interexchange and enhanced services - to which the Customer already subscribes.
- Without Customer approval, we do not use, disclose or permit access to CPNI to provide or market service offerings within a category of service to which the Customer does not already subscribe, except as permitted by FCC rules.
- We do not use, disclose or permit access to CPNI to identify or track Customers that call competing service providers.
- We apply all CPNI rules to Captive Communications/dba OneCloud Networks Voice, Data, and Managed Services

2. CPNI Customer Approvals

- When Customer approval to use, disclose or permit access to Customer CPNI is desired, we obtain approval through written or oral methods. (However, we only utilize the oral authorization to obtain limited, one-time use of CPNI for inbound and outbound customer telephone contacts; such CPNI authority, if granted, lasts only for the duration of that specific call).
- We will honor a Customer's approval or disapproval until the Customer revokes or limits such approval or disapproval.
- Subject to FCC requirements and Customer approval, we use a Customer's individually identifiable CPNI to market communications-related services to that Customer.
- We do not disclose or allow access to Customers' CPNI to any partner or independent contractors for marketing or sales purposes, unless give permission from the Customer

3. CPNI Notice Requirements

- We notify and inform our Customers of the right to restrict the use or disclosure of, and access to, CPNI along with a solicitation of approval, and we maintain records of that notification for at least one year.
- Our notifications provide information to allow our Customers to make informed decisions as to whether to permit the use or disclosure of, or access to, their CPNI. Our notifications do:
 - contain a statement that the Customer has a right, and we have a duty, under federal law, to protect the confidentiality of CPNI
 - specify the types of information that constitute CPNI and the specific entities that will receive CPNI
 - describe the purposes for which the CPNI may be used
 - Inform the Customer of the right to disapprove those uses and deny or withdraw access to CPNI use at any time.



- We provide our Customer exact procedure to grant or deny access to CPNI, and which any decision made will not affect the any services to the Customer

4. CPNI Protections

- We have implemented a system by which the status of a Customer's CPNI approval can be clearly established prior to the use of the CPNI.
- We have trained our personnel on the following:
 - as to when they are, and are not, authorized to use CPNI
 - not release Customers' CPNI over the phone
 - notify customers of account changes
 - Protect against fraudulent acquisition of Customer CPNI ("pretexting") and continue to develop measures to protect against activity that is indicative of pretexting.
- We use passwords to protect online access to CPNI
- We record of any breach and subsequent customer notification.